USAMC INSTALLATIONS AND SERVICES ACTIVITY (AMC I&SA)

FY 99 LESSONS LEARNED

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MR. L. F. COLE, ACTING DIRECTOR

USAMC INSTALLATIONS AND SERVICES ACTIVITY (AMC I&SA)

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INTRODUCTION

1. We prepare the AMC I&SA Lessons Learned annually in an effort to improve our service to you. It provides a functional summary of major observations resulting from our construction program oversight, technical assistance visits, and from the following assistance/compliance reviews:

a. Facilities Engineering/Energy Programs Review (FE/EPR).

b. Fire and Emergency Services Operational Readiness Inspections (F&ESORI).

c. Food Service Program Management Reviews (FSPMR).

d. Environmental Compliance Assessment System (ECAS) Review.

e. Natural Resources Program Review (NRPR).

f. Command Equipment Management Program Review/Equipment Survey Program (CEMPR/ESP).

g. Administrative Transport Management Survey (ATMS).

h. Command Supply Management Review (CSMR).

2. The AMC I&SA Lessons Learned covers our three major functional areas of Facilities Engineering, Environment, and Installation Logistics. We provide points of contact, with email addresses, for each issue discussed so that you can obtain more information.

3. If you desire additional copies of this document, contact Ms. Swift, AMXEN, DSN 793-5536, or Email swiftj@ria.army.mil. You can also access the FY 99 Lessons Learned on our Home Page at **www.ria.army.mil/isa/pubs.htm**.

FACILITIES ENGINEERING

1. SUBJECT: Improved Operation and Reduced Maintenance Costs with Electronic Control Devices.

a. ISSUE: Army installations can improve utility operations and minimize maintenance costs by using electronic protection and control devices.

b. DISCUSSION:

(1) Electro-mechanical relays, meters, and other devices for over-current protection, power demand, and energy measurements are in use for utility systems in many Army installations. These units require trip settings, calibration, and other adjustments annually by experienced technicians for accurate and reliable operation, which results in high maintenance costs.

(2) Electronic control devices can economically improve this condition. These units provide protection control to primary and secondary distribution circuits at reasonable costs. They can be programmed and used to retrofit existing substations with electro-mechanical devices with little or no switchgear modification. They need no future calibration and other adjustments, which results in significant savings in recurring maintenance costs.

(3) Several electrical companies make electronic control devices and can provide technical guidance to meet specific requirements at no costs. One of many companies with information is the Basler Electric Company, Highland, IL, (618) 654-2341, at **www.basler.com/htm/ add.htm**.

c. POC: P. Biswas/AMXEN-C/DSN 793-5832.

2. SUBJECT: Fire Department Staffing.

a. ISSUE: Installation fire departments are undermanned.

b. DISCUSSION:

(1) Department of Defense (DOD) and Department of the Army (DA) fire protection standards set minimum staff levels to man installation fire companies. Some installation fire companies fall below these minimum levels potentially exposing these firefighters to unsafe conditions. In addition, the Occupational Safety and Health Administration (OSHA), National Fire Protection Association, DOD, and DA have set minimum staffing levels required before an attack can be made on a structural fire.

(2) Allowing fire companies to fight a fire with inadequate staffing can lead to adverse actions against the Government, as was experienced at Fort Gordon. Department of Defense Instruction (DODI) 6055.6, 15 Dec 94, DOD Fire Protection Program, specifies the fire fighter staffing levels. There are legal opinions indicating that DODI 6055.6 has the force and effect of law and adherence to it is mandatory. Any deviance from DODI 6055.6 requires an approved waiver with a risk assessment.

(3) Inadequate staffing also leads to excessive overtime at some installations. This can lead to problems associated with being overworked, as well as excessive labor costs. This is not a good long-term solution.

c. POC: K. Oehler/D. Reed/AMXEN-C/DSN 793-8260/6138.

3. SUBJECT: Contracts between Government and Contractors

a. ISSUE: At Government-Owned, Contractor-Operated (GOCO) installations, contracts between the Government and the contractor make no provisions to follow DODI 6055.6 and AR 420-90, 10 Sep 97, Fire and Emergency Services.

b. DISCUSSION: This practice contributes to a deterioration of our installations' Fire and Emergency Services (F&ES). Both Army and DOD regulations (under Applicability and Policy) specify that GOCO operations are required to adhere to the F&ES requirements in the regulations. Much of the guidance contained in the regulations is an extension of what is contained in OSHA and other Public Laws. In fact, there are legal opinions that indicate that DODI 6055.6 has the force and effect of law and adherence to it is mandatory. This potentially leaves the Government open to grievances and law suits.

c. POC: K. Oehler/D. Reed/AMXEN-C/DSN 793-8260/6138.

4. SUBJECT: Work Classification.

a. ISSUE: Installation of a new fire sprinkler system - is it construction or repair? What is the statutory dollar limitation on construction?

b. DISCUSSION:

(1) Construction or Repair: We come across this type of question very often from our U.S. Army Materiel Command (AMC) installations for clarification. Whether it is construction or repair depends upon the situation. When repairing a facility you may now bring the facility (or a component of a facility) up to applicable codes or standards as repair. An example would be adding a new sprinkler system as part of a barracks repair project. However, bringing a facility or component thereof up to applicable codes (for example to meet current Fire/Life/Safety codes) or standards for compliance purposes only, when a component or facility is not in need of repair, is construction.

(2) Statutory Limitation on Construction: AR 420-10, 15 Apr 97, Management of Installation Directorates of Public Works, paragraph 4-1c, states a construction project will be financed from appropriations available for operations and maintenance if the project has total funded costs of $500,000 or less, or if it has total funded costs of $1M or less and is intended solely to correct a deficiency that is life-threatening, health-threatening, or safety-threatening (LHS). Fire sprinkler system projects are valid projects under the LHS allowance for construction up to $1M using Operation and Maintenance, Army (OMA) funds. Remember that all construction in a facility must be included in a single approval document. If there is a mix of LHS and non-LHS construction in the same facility, then the combined construction cost cannot exceed a total of $1M and the non-LHS portion cannot exceed $500K. Each project must produce a complete and usable addition to a facility, system, or component.

c. POC: R. Penmatcha/AMXEN-C/DSN 793-8296.

5. SUBJECT: Military Construction, Army (MCA) Program Support to Base Realignment and Closure (BRAC).

a. ISSUE: Can we mix MCA funds with BRAC?

b. DISCUSSION:

(1) We have two projects at Crane Army Ammunition Activity (CAAA) -- one in FY 98 to build the Containerization Facility (MCA funds) and the second in FY 99 to construct the Universal Test Facility (BRAC funds). The Navy is the executive agent for the design and construction of these facilities at CAAA. The test facility project required a fill surcharge for 6 months due to poor soil foundation. We cannot meet the

proposed BRAC mission move schedules from Savanna Army Depot to CAAA due to the foundation problem unless DA releases BRAC funds in FY 98. We tried to get authorization in FY 98 for this BRAC project, but did not succeed.

(2) As part of the FY 98 MCA project we had excess excavation, which requires disposal to a waste area on the base. We recommended hauling the excess soil from the MCA site to the BRAC site to surcharge the existing foundation with fill. Remember, we cannot mix BRAC and MCA funds unless DA authorizes it, even if one of the projects had sufficient funds to support the other. Since our proposal requires removal of topsoil, demolition, and hauling excess dirt an additional distance to the BRAC site, we requested authorization from DA.

(3) Even before we got the authorization from DA we had solicited bids for the MCA project with an additive to take care of the fill surcharge at the BRAC site. The cost of the additive was only $105,000 compared to the cost of double handling the soil, loss of time in meeting the schedules, and additional cost of contractor mobilization to surcharge first and start building construction after 6 months. Since our proposal not only saved over $250,000 and gets the job done smart, DA approved it to support the BRAC project using the MCA construction contract.

c. POC: R. Penmatcha/AMXEN-C/DSN 793-8296.

6. SUBJECT: Design of Facilities with Variable Capacities.

a. ISSUE: We usually design facilities using only maximum capacity numbers that can lead to a poorly performing or inefficient facility when the full capacity is not required or utilized.

b. DISCUSSION:

(1) When designing new facilities or retrofitting existing ones, keep in mind that the mission may change. The concept of designing to allow for only partial use of space, hydraulic capacities, and electrical and mechanical features can apply to many of our military facilities. As an example, a water or sewage treatment plant may function quite well at Design Capacity (DC), but poorly or inefficiently at 25 percent of DC after a mission change.

(2) Proper layout and a few additional features can allow for efficient operations at diminished flow rates. Administrative and other similar buildings can be designed for variable occupancy by considering inactivation of such items as restrooms/plumbing and discrete portions of the building. Another option may be to use two independent

heating, ventilating, and air conditioning units where only one would normally have been used. When occupancy is such that only one unit is needed, the second one can be mothballed. When both are in use, the second one also provides some redundancy so that the entire building is not out of service in the event that one fails.

c. POC: C. Reindl/AMXEN-C/DSN 793-8264.

7. SUBJECT: Maintenance of Roads and Railroads with Austere Budgets.

a. ISSUE: When installation Real Property (RP) funding is reduced, road and railroad maintenance are often some of the first items cut.

b. DISCUSSION: Even with austere budgets, some maintenance must be done to preserve our facilities. Probably the most important is to maintain drainage and keep culverts, bridges, and trestles clear of debris. It is certainly less expensive to remove debris rather than lose a bridge or trestle due to a high water event. Vegetation control on railroad tracks is another important maintenance item. Renewing centerlines on major roads should also not be overlooked, and also keeping safety devices such as regulatory signs replaced when faded and guardrails in proper working condition. Low cost maintenance such as crack sealing will help preserve a roadway surface without the expense of an overlay. Chip seals are another economic alternative you can use.

c. POC: C. Reindl/AMXEN-C/DSN 793-8264.

8. SUBJECT: RP Training Improves Real Property Inventory (RPI) Accuracy.

a. ISSUE: AMC and Defense Logistics Agency (DLA) installation RP representatives required training in the use of the Integrated Facilities System (IFS) Client/Server (C/S).

b. DISCUSSION: The AMC I&SA RP Team provided IFS C/S training to AMC and DLA representatives during the AMC Real Estate/RP Management Workshop, 2-6 Aug 99. All attendees expressed their appreciation and relayed they felt more comfortable with making their 4th Qtr FY 99 RPI and future RPI submissions. The benefit of

providing the training session was evident in the quality and completeness of the 4th Qtr FY 99 RPI updates from these sites.

c. POC: K. Terrill/AMXEN-C/DSN 793-5646.

9. SUBJECT: Reporting Safety Shelters in the RPI.

a. ISSUE: The previous version of DA Pam 415-28, Real Property Category Codes, contained category code 14181, Safety Shelter. This category code was for reporting buildings and building Square Feet (SF).

b. DISCUSSION:

(1) There was no category code for reporting safety structures that were not buildings. Additionally, reporting safety structures in the previous category code for safety buildings distorted AMC's totals for building counts and building SF.

(2) AMC formally requested the revised DA Pam 415-28 include a category code for reporting safety structures (roofed structures with open sides).

(3) The revised DA Pam 415-28, Dec 98, includes a category code (14181) for reporting Safety Shelters (facilities that have a roof and one or more walls, but are not completely enclosed). The pamphlet also includes a category code (14176) for reporting Safety Buildings (facilities that have a roof and are enclosed with walls). Safety buildings may consist of a single use building or a use within a multi-use.

(4) The SF for those facilities that are actually structures is now included with totals for structured SF instead of distorting AMC’s totals for numbers of buildings and building SF.

(5) Installations should review their RPI to ensure they are correctly reporting these facilities.

c. POC: K. Terrill/AMXEN-C/DSN 793-5646.

10. SUBJECT: Reporting Monitoring Wells in the RPI.

a. ISSUE: Many installations are not reporting their Monitoring Wells, category code 89210, in their RPI.

b. DISCUSSION: Installation RP Officers should ensure monitoring wells are accurately reported in their RPI. Additionally, Other Measure Total (capacity) is Each (EA). Several wells may be reported under the same facility number as long as the quantity (EA) is reported. Large installations may want to report quantities of Monitoring Wells in accordance with installation numbering plan. For example, if an installation's facility numbers are assigned by quartering the installation (00001-00099,

00100-00199, 00200-00299, 00300-00399), an installation could assign a summary facility number in each of the four areas of the installation to capture the quantity in that portion of the installation. Information regarding costs and numbers of wells should be available from the installation's Environmental Office.

c. POC: K. Terrill/AMXEN-C/DSN 793-5646.

11. SUBJECT: Capitalizing Maintenance and Repair (M&R) Dollars in the RPI.

a. ISSUE: AMC and DLA installation RP representatives are not capitalizing M&R dollars in the RPI.

b. DISCUSSION:

(1) The Assistant Chief of Staff for Installation Management (ACSIM) included guidance for capitalizing M&R dollars in the RPI with the release of policy memorandum, 15 Apr 97, subject: Interim Policy and Procedure Changes to AR 405-45, Inventory of Army Military Real Property.

(2) The AMC I&SA RP Team provided the above memorandum to AMC and DLA installations and activities, as follows:

(a) AMC Real Estate/RP Management Workshop in Rock Island, IL, 4 Aug 99.

(b) Memorandum, 26 Apr 99, subject: Interim Policy and Procedure Changes to AR 405-45, Inventory of Army Military Real Property.

(c) Memorandum, 4 Aug 97, subject: Interim Policy and Procedure Changes to AR 405-45, Inventory of Army Military Real Property.

(3) Guidance on capitalizing M&R dollars is also addressed in AR 420-70, 10 Oct 97, Buildings and Structures, and DA Pam 420-11, 7 Oct 94, Project Definition and Work Classification.

(4) Installations should report M&R ("K" work) dollars that are deemed to be capital improvements IAW above references in their RPI. Installation Project Engineers should determine which M&R projects should be capitalized.

c. POC: K. Terrill/AMXEN-C/DSN 793-5646.

12. SUBJECT: Implementing Defense Property Accountability System (DPAS) for RP.

a. ISSUE: AMC and DLA installations will implement DPAS to improve reporting of their financial RP cost and depreciation information.

b. DISCUSSION:

(1) IFS:

(a) Reports inaccurate General Ledger Account Code totals in the Financial Summary Report On Real Property.

(b) Does not have the capability for installations to consistently and accurately calculate depreciation costs.

(c) Interim Change Package (ICP) 12-01 enables IFS to send (interface) RP financial information from IFS to DPAS.

(2) DPAS:

(a) Is the migratory system DOD selected for reporting financial information on personal and RP as mandated under the Chief Financial Officer's Act of 1990 (Public Law 101-576).

(b) Is currently used at AMC sites to report personal property.

(c) Release 9.0 incorporates the capability to receive RP financial information in DPAS from IFS.

(d) Will enable installations to consistently and accurately report RP capitalizations and depreciation information in their financial statements.

c. POC: K. Terrill/AMXEN-C/DSN 793-5646.

13. SUBJECT: AMC Installations Using Real Property Standalone (RPS) Migrate to IFS C/S Automated System for RPI Reporting.

a. ISSUE: All AMC installations must ensure the current versions of IFS C/S are installed for RPI reporting.

b. DISCUSSION:

(1) Many AMC installations have been using RPS on a Personal Computer (PC) with MS-ACCESS 2.0, which is not Year 2000 (Y2K) compliant.

(2) AMC I&SA has migrated all RPS sites to IFS C/S ICP 11-04 to ensure Y2K compliance. Some of the GOCO sites had RPS ICP 11-03. Those sites had ICP 11-04 loaded prior to transfer to the IFS server.

(3) The IFS C/S has a different data structure than RPS. Conversion programs have been written to transfer the RPS data to the IFS data format.

(4) Installing the IFS C/S software has been a challenge. The biggest obstacles have been firewalls, networking, and power outages. Also, some sites have Oracle For Windows (16-bit) applications already installed on the PC. A procedure is in place to ensure that the different Oracle applications are not in conflict.

(5) Creation of Oracle data bases have led to the discovery that some of the IFS scripts for generating Oracle constraints do not work from the IFS menu. The constraints determine data duplication. The Customer Assistance Office at Fort Lee, VA has been alerted to the problem.

(6) Software Development Center-Lee developed a procedure to use electronic mail to send reports and stored queries to the users. Some sites experienced problems in receiving reports. This has been due to electronic mail size limitations, firewalls, and networking. AMC I&SA is continuing to pursue this issue. Also, sites using MS-Office 2000 are experiencing compatibility issues with MS-Outlook and MS-Office 97.

(7) The IFS C/S Real Property Planning and Analysis System refresh procedures differ from RPS. The refresh scripts should have been provided earlier.

c. POC: G. Troyer/AMXEN-C/DSN 793-8297.

14. SUBJECT: Facility Reduction Program (FRP).

a. ISSUE: Some of the 13 critical FRP data fields in the RP data base contained invalid or missing information.

b. DISCUSSION: AMC I&SA tracks the FRP program for installation requirements for multiple years and demolished facilities for the current FY. AMC I&SA uses the query ‘FRP Query for Excel Spreadsheet’ (a query developed by the Corps of Engineers Installation Support Division) to extract the 13 critical FRP data elements

from the site's IFS C/S RP data bases. AMC I&SA provided the list of these 13 critical fields to the sites during the Jun 99 and Aug 99 workshops held in Bettendorf, IA. Following are some of the examples with invalid or missing information for these critical fields:

(a) The FRP requirements for FY 00-03, submitted by sites as of 10 May 99 RPI update, still contained year disposal planned as 1997 and 1998 for facilities that were not demolished due to lack of funding. These years should be changed to FY 00 or any other valid future years.

(b) The field 'Estimated Cost to Demolish' was often left blank for facilities planned for disposal. Sites were telling AMC and DA that they do not need any money to demolish the facilities. Sites could use an estimated cost of $12.00 per SF for contamination free facilities; otherwise, use a valid estimated cost. The field 'Actual Cost to Demolish' was often left blank for facilities demolished.

(c) The 'Planned Disposition Code (PDC)' field often had a blank or an invalid code. Use of a valid code in this PDC field would get the sites proper credit for FRP. Valid FRP codes are 'G (FRP Target)', 'H (MCA and Foot Print Disposals)', 'J (One-For-One Disposals)' and 'W (Layaway Pending Disposals)'. Use of valid codes is critical to obtain FRP credits after disposals are complete and to show the requirements to receive scarce FRP dollars allocated by the ACSIM.

(d) The fields 'Project Fiscal Year, Project Number, and Type of Funds Used' were often left blank.

(e) The date fields 'HUD Date, Approval Date, Demolition Start Date, Demolition Completion Date, and Date to Drop the Record from Inventory' sometimes were left blank.

(f) The field 'RPF Reportability Code' sometimes had an invalid code. The valid code for demolished facilities is 'D' and should be blank for facilities planned for future demolitions.

(g) Sites created multiple disposal records for a single facility. There should be only one disposal record per facility.

c. POC: N. Yerra/AMXEN-C/DSN 793-8290.

ENVIRONMENT

1. SUBJECT: Two Options for Re-refined Oil

a. ISSUE: In the United States (US) over 120 million gallons of motor oil are thrown away! As a result, in the continental US there is the equivalent oil spill of one Exxon Valdez every month. Oil is a valuable resource that is being wasted. Procuring re-refined oil is the right thing to do. But also, by Executive Order (EO) 1310, it's the law. Oil does get dirty but it does NOT wear out!

b. DISCUSSION: The Defense Supply Center Richmond (DSCR), the DOD material manager of packaged petroleum products, now offers two options for re-refined oil.

(a) Option One: The DSCR will now automatically substitute Commercial Item Descriptions A-A- 52039 and A-A-52306 re-refined oils for the virgin commercial products. This program offers various grades of oil and is available in the continental US and overseas.

If You Order This Virgin Commercial		Unit of Issue	You Will Receive This Re-refined Commercial	
9150-01-227-8210	10W30	Box	9150-01-413-6897	10W30
9150-01-230-9749	10W30	Co (5 gal)	9150-01-413-6892	10W30
9150-01-230-9748	10W30	Drum	9150-01-413-6990	10W30
9150-01-320-3706	5W30	Box	9150-01-422-9253	5W30
9150-01-348-1596	5W30	Drum	9150-01-422-9326	5W30
9150-01-351-9019	15W40	Box	9150-01-422-8899	15W40
9150-01-352-2962	15W40	Co (5 gal)	9150-01-422-8750	15W40
9150-01-351-9018	15W40	Drum	9150-01-422-8746	15W40
9150-01-351-9016	30	Box	9150-01-422-9250	30
9150-01-352-8090	30	Co (5 gal)	9150-01-422-9247	30
9150-01-351-9015	30	Drum	9150-01-422-8997	30

9150-01-352-8091	40	Drum	9150-01-522-8901	40
The DSCR has not yet established the automatic substitution of virgin military specification MIL-PRF-2104 oils (combat tactical service).				

(b) Option Two: The Closed Loop Program. This has been available for a few years already. The Closed Loop offers API certified oil 10W-30 and 15W-40 (both CID and Milspec.) The prices are low and include complimentary pick-up of your used oil. Closed Loop oil is available in quarts, 5 gallon containers, 55 gallon drums, and bulk deliveries. One happy customer is McAlester Army Ammunition Plant. The switch to the closed loop system was easy, they tell us: Item managers changed the national stock numbers, and the program started up automatically. One phone call and the used oil is picked up. The DSCR point of contact is Mr. Jim Fazzio at (804) 279-4908, DSN 695-4908, e-mail **jfazzio@dscr.dla.mil.**

c. POC: K. LaFrenz/AMXEN-U/DSN 793-8263.

2. SUBJECT: Tritium Exit Signs.

a. ISSUE: AMC installations use radioluminous tritium exit signs in explosive and remote areas. An Army installation was recently cited by the Nuclear Regulatory Commission for mishandling of the signs.

b. DISCUSSION:

(1) Here's simple steps to comply with the Nuclear Regulatory Commission rules. Pay particular attention during building demolition and building transfer.

- Ensure building documents for closure, transfer and historical purposes include information that the tritium signs are present.

- Prior to building demolition, ensure proper removal and disposal of tritium exit signs.

- Do not landfill signs.

- Contact the Radioactive Waste Group at the U.S. Army Industrial Operations Command to take your unwanted tritium exit signs.

- POC for the Radioactive Waste is Kelly Crooks, DSN 793-0338 or (309) 782-0338.

(2) For tritium exit signs still in use, do the following:

- Follow instructions on exit sign label for installing, servicing, and removing.

- Maintain records showing exit sign installing, servicing, and removing dates.

c. POC: K. LaFrenz/AMXEN-U/DSN 793-8263.

3. SUBJECT: AMC Guidance on EO 13101 Is On It's Way.

a. ISSUE: DA and DOD have not yet finalized guidance to implement the new EO 13101 and we can't afford to wait.

b. DISCUSSION:

(1) EO 13101, nick-named "Greening of The Government", directs federal agencies to purchase designated items that meet or exceed guideline standards for recycled content. With the "Green" in the title, many installations assume this involves only the environmental folks. Wrong. In fact, this EO applies to all those involved in procurement and specifications of the following categories:

- Paper Products
- Office Products
- Vehicular Products
- Construction Products
- Landscaping Products
- Park and Recreational Products
- Transportation Control Products
- Pallets

(2) We won't go through all the details here. EO 13101 is on the Environmental Protection Agency's (EPA's) website at **www.epa.gov/opptintr/epp/.** You can find details and information on how other activities throughout the Government are implementing this policy at the AMC P2 Kiosk at **www.htscm.com/P2/P2Main.html.** The AMC Interim policy is coming out soon. But the requirements of EO 13101 are

already in effect, so don't wait for the AMC policy. Get the word out now. The EPA has already added the requirements of this EO to their inspection checklists.

c. POC: K. LaFrenz/AMXEN-U/DSN 793-8263.

4. SUBJECT: P2 Investment Fund (P2IF).

a. ISSUE: P2IF increased from $7.5 million in FY 99 to $10 million for FY 00-05. Don't miss out on an opportunity to have your project funded through P2IF.

b. DISCUSSION:

(1) The objective of P2IF is to fund cost effective installation-level P2 projects which result in:

- Source reduction.
- Compliance through P2.
- Support of DOD P2 Measures of Merit (MOM).

(2) Submit candidate P2IF projects via the Environmental Program Requirements (EPR) data base. The MACOMs and U.S. Army Environmental Center (AEC) query the EPR data base twice yearly for candidate P2IF projects. Key points to identify on the EPR are:

- Appropriate P2 Category Code -- G01 for OMA funding and G02 for Other Procurement, Army (OPA) funding.
- Number of identical units.
- Unit Investment Cost.
- Total Annual Unit Savings.
- Annual Unit Pollution Reduction.
- Specify Major Pollutant.

- Regulatory Driver in addition to EO 12856.
- Ensure narrative clearly spells out information on the project.

(3) When you submit your projects for P2IF consideration, check the Sep 99 P2IF Guidance from DAIM-ED. It is on the Defense Environmental Network Information Exchange (DENIX) and includes additional important details.

c. POC: K. LaFrenz/AMXEN-U/DSN 793-8263.

5. SUBJECT: Review of Fall 1999 EPR Exhibits.

a. ISSUE: EPR exhibits lack data to pass the Quality Assurance/Quality Control (QA/QC) process.

b. DISCUSSION:

(1) AEC indicates installation exhibits are not prepared in a manner to clearly justify the project. Common problems identified across the command were inadequate narratives, numerous environmental requirements identified in a single exhibit, incorrect Law/Reg or ECAT selected, P2IF projects did not have the proper G-Code entered, and/or the projects did not qualify as an environmental requirement. Refer to the current EPR Policy and Guidance dated Aug 98, with the Jul 99 Addendum.

(2) The projects were reviewed against criteria established in the "Quality Assurance Handbook for Environmental Program Report", Chapter 4, EPR Functional Review Criteria, Tables 4-1 (Essential Criteria), and Table 4-2 (Important Criteria). The Essential Criteria consists of six check items, listed below:

(a) Does project meet criteria of an environmental project?

(b) Is the correct Law/Reg identified?

(c) Is the narrative adequate? (WHAT needs to be done; WHY it needs to be done--regulatory driver, DOD MOM, etc; and the Number of units involved--in the case of Solid Waste Management Units (SWMUs)-identify the number and names of the SWMUs).

(d) Is project correctly identified as a Must Fund?

(e) Are recurring costs identified as Class 0?

(f) If a P2IF project, are cost-benefit data provided?

(3) You can download the aforementioned document from DENIX, under the DOD Menu. You will need a Login and Password to access the DOD Menu. The web site is: **www.denix.osd.mil/denix/DOD/Interaction/Reporting/EPR.**

(4) If you have any questions or require assistance in preparing a quality exhibit to pass the QA/QC process, contact our office. We can also provide assistance in the manipulation of the different data bases within EPR; ".rll", ".zip", and the Environmental Security Corporate Reporting System (ESCRS) data base. Each of these data bases has a unique function, and understand the functions may help in organizing your data more efficiently. The lower right corner of the EPR screen will indicate what type of tile you have open.

(a) The ".rll" files are used for combining and rolling up your data for reporting up the chain. No changes should be made to a ".rll" file. Changes may not take (save).

(b) The ".zip" files are "working data bases" where you make your changes/updates/editing. When you are ready to submit up the chain, you save the file as a ".rll" file and forward to the next level of command. You can also use the ".zip" files to keep a historic record of each submission, in lieu of having only one data base that is in constant flux. Just save with a different name: i.e., RIAF99.zip--Rock Island Arsenal-Fall 1999 submission; RIAS00.zip--Rock Island Arsenal-Spring 2000 submission; etc.

(c) The ESCRS data base is designed to interact with other data bases (i.e., Installation Status Report-Part 2), and should not be used as your "working data base". Normally, you would use the ".rll" file for the ESCRS (preferably the "approved" Fall submission).

c. POC: M. Moffitt/AMXEN-U/DSN 793-5040.

6. SUBJECT: Environmental Compliance Assessment System (ECAS) Protocols - Where are they?

a. ISSUE: ECAS Protocols are no longer available hard copy, making it difficult for installations to keep current on compliance requirements.

b. DISCUSSION:

(1) ECAS Protocols (Team Guide and Active Army Supplement) have not been available in hard copy since 1998. However, you can keep current on compliance requirements by downloading/accessing the protocols from DENIX, under the DOD Menu. The web site is: **www.denix.osd.mil/denix/DOD/Library/Assessment/tools.html**. You will need a Login and Password to access the DOD Menu. The Team Guide and Active Army Supplement are updated quarterly. You have an opportunity to review the draft protocols at this same web site. Scroll down to "Drafts" to review and comment.

(2) You can access the State protocols also. They are updated once per year.

(3) Please note, the ECAS software does not include "current" protocols. The latest version of protocols in the software is 1997. If you wish to have the "current" protocols loaded into your ECAS software, please contact either Mr. Gary Badtram (DSN 793-8262) or Mrs. Sharon Lampert (DSN 793-8303). We will use the MS-DOS ECAS software for FY 00 ECAS reviews. Plans are in place to upgrade the software to a "windows-type" version in the near future.

c. POC: M. Moffitt/AMXEN-U/DSN 793-5040.

7. SUBJECT: OSHA and EPA Requirements Regarding Asbestos Surveys.

a. ISSUE: Based on data resulting from FY 99 ECAS Reviews, we learned several AMC Installations had not completed Installation Wide Asbestos Surveys. During most reviews, installation personnel did not realize that OSHA mandates the requirement to account for asbestos with facilities and that EPA mandates several requirements which must be followed in order to complete a survey.

b. DISCUSSION:

(1) EPA is very clear on their position regarding requirements to complete asbestos surveys in facilities. An asbestos survey is not a part of their regulatory requirements except in schools with students K-12. However, if asbestos surveys are accomplished in a public or private building, the survey must be accomplished in accordance with EPA requirements (40 CFR 763, Subpart E). EPA still requires an inspection on all materials suspected of containing asbestos if planned activities may break up, dislodge and/or disturb these materials.

(2) OSHA takes a different approach. Based on one of OSHA's publications regarding asbestos containing materials in facilities, (August 10, 1994, Federal Register Volume 59, No. 153) each building and facility owner must complete one of two options in order to satisfy current regulatory requirements involving asbestos surveys. The first option includes conducting a survey on all thermal system insulation throughout each facility, and all asphalt flooring installed not later than 1980 to determine whether or not these materials contain asbestos. The second option includes classifying all of the above listed materials as Presumed Asbestos Containing Materials (PACM) and treating the materials as asbestos. With either option, OSHA requires facility owners to notify certain employees of the presence and location of PACM when it is located where they perform their duties.

c. POC: W. Taylor/AMXEN-U/DSN 793-4455.

INSTALLATION LOGISTICS

1. SUBJECT: Design and Implementation of the Army's Facilities and Equipment Maintenance System (FEM).

a. ISSUE: The assignment of FEM management to an MSC in FY 96 resulted in design and implementation delays and ultimately a delay in realizing the full FEM functional and financial benefits.

b. DISCUSSION:

(1) The Joint Logistics Systems Center selected FEM to support the DOD wholesale depot maintenance mission by providing a customized tool to manage the maintenance of facilities and production support equipment. The heart of FEM is MAXIMO, a commercial off-the-shelf maintenance management system. MAXIMO becomes FEM after a contractor designs a service customized shell to provide service peculiar input/output.

(2) An element of the MSC's depot maintenance mission managed FEM. These individuals were unfamiliar with facilities and production support equipment maintenance and the management of standard systems. This resulted in very little progress being made. The MSC's FY 98 reorganization brought the Army FEM effort to a halt and personnel reassignments did not provide for FEM management.

(3) At this point, AMC I&SA requested the assignment of FEM management since we are the domain manager for installation logistics systems and the AMC focal point for management of installation support equipment. The assignment of systems management was made without consulting all functional elements of HQ AMC and the Separate Reporting Activities. As a result there was over a 3-year delay in realizing the system's benefits.

c. POC: L. Johnsen/AMXEN-L/DSN 793-3900.

2. SUBJECT: Equipment Utilization Management Plan (EUMP).

a. ISSUE: Some installations are not following their EUMP.

b. DISCUSSION:

(1) The Army objective is to obtain optimum use and efficient management of equipment used by Tables of Distribution and Allowances (TDA) activities to meet mission requirements with a minimum of equipment. You will find usage standards with management programs for some types of equipment already established and published.

(2) The purpose of the EUMP is to prescribe usage standards for types of equipment not managed by other Army or DOD publications. The EUMP gives you the capability of designing your own plan to meet the needs and requirements of your mission. Once you prepare and we approve your plan, you must follow it. If requirements change or you wish to revise your EUMP, submit the changes to us for approval.

c. POC: P. Grobe/AMXEN-L/DSN 793-3482.

3. SUBJECT: Depreciation of Equipment Not In Use.

a. ISSUE: Some Army Working Capital Fund (AWCF) installations are improperly recording their depreciation.

b. DISCUSSION: If you purchased equipment with AWCF, you must depreciate equipment not in use as "funded". Assets removed from use, regardless of the period and for whatever reason, shall continue to depreciate during that period. Funded depreciation refers to depreciation expense included in the Statement of Net Cost and affects the income or loss for the period. Release 9.0 in DPAS contains a new code entitled "expense code" that allows you to identify items as funded. All AWCF installations should enter a "1" if you use the item or not.

c. POC: P Grobe/AMXEN-L/DSN 793-3482.

4. SUBJECT: Authorization Management.

a. ISSUE: Authorizations need correcting.

b. DISCUSSION: The type authorization for certain items is inaccurate. Listed below are the authorizations requiring verification. You can make corrections using the mass change capability in DPAS:

(a) Change ARS310-49 and ARS310-49-1 to ARS71-32. AR 71-32 supersedes these two regulations.

(b) The TDA authorization should consist of TDA, your unit identification code, and the Command Control Number (CCNUM) of your latest approved TDA. During our reviews, we find the TDA authorization does not contain the latest approved CCNUM.

c. POC: N. St. Clair/AMXEN-L/DSN 793-6334.

5. SUBJECT: DA Form 2408-9, Equipment Control Record.

a. ISSUE: Installations are not submitting DA Forms 2408-9 in a timely manner.

b. DISCUSSION:

(1) In accordance with AR 710-3, 15 May 92, Asset Transaction Reporting System, and AMC Supplement 1 to AR 710-3, 20 Apr 94, you **MUST** forward this form within 10 working days to AMC I&SA, ATTN: AMXEN-L, following acceptance, transfer, gain, national stock number redesignation, or loss of reportable equipment. To expedite this procedure, complete the DA Form 2408-9 found on our home page at **www.ria.army.mil/isa/** and send it to us electronically.

(2) It is imperative that we receive your DA Forms 2408-9 within the required timeframe. We maintain an inventory of mobile equipment within AMC and use this inventory to plan, coordinate, redistribute serviceable assets, and program replacements between the MACOM and the National Inventory Control Point.

c. POC: L. Emerick/AMXEN-L/ DSN 793-8322.

6. SUBJECT: Mobile Equipment Reports.

a. ISSUE: Not all installations are submitting their yearly reports in a timely manner.

b. DISCUSSION: Installations are responsible for submitting the following DPAS reports on a yearly basis:

(a) NTV Cost Accounting and Management Report (DP8D211A). This report lists all nontactical wheeled vehicles, excluding loaned/leased, and is due by 15 October of each year. The user is responsible for entering the fuel cost, commercial shop cost, total direct/indirect cost, and cost per mile.

(b) USA Registration Number Report-1086 (DP8D211A). This report provides an annual summary and identification of vehicles on the Property Book (PB). There are three separate dates for this report. Each year, the depots are due by 1 April, arsenals and ammunition plants by 1 July, and all other installations by 1 January.

(c) Commercial Design Vehicle Usage Report (DP8N101A). This report provides administrative usage identification of commercially designed vehicles and is due by 15 October of each year.

c. POC: N. St. Clair/AMXEN-L/DSN 793-6334.

7. SUBJECT: Fixed Asset Cost Validation Files.

a. ISSUE: Some installations do not have documentation to support the value of equipment.

b. DISCUSSION: Installations are responsible for establishing and maintaining files for each capital asset. This file must contain acquisition documentation, such as receipt documents, purchase orders, contracts, delivery orders, invoices, or any document identifying an acquisition cost for the item. All AWCF activities must do this for equipment meeting current capital criteria for FY 91 to FY 96. Non-AWCF activities will use the current capitalization criteria of $100,000 as a basis for establishing the fixed asset files. You must maintain the cost validation files for the life of the equipment.

c. POC: P. Grobe/AMXEN-L/DSN 793-3482.

8. SUBJECT: Automatic Data Processing Equipment (ADPE) Accountability.

a. ISSUE: Some installations dropped ADPE under $2,500 from their PBs.

b. DISCUSSION: The Clinger-Cohen Act of 1996 mandated more intensive management of ADPE in DOD. This included budget justifications that must include quantitative data. You must account for all ADPE on your PB. If you do not, there is no visibility by the Army's Chief Information Officer. No data means no program objective

memorandum input and no money for equipment upgrades or equipment replacement later.

c. POC: M. Morris/AMXEN-L/DSN 793-8301.

9. SUBJECT: The AWCF Review of General Property, Plant, and Equipment.

a. ISSUE: Key financial elements in DPAS are incorrect causing inaccurate financial statements.

b. DISCUSSION: AWCF activities must verify accounting related fields in DPAS for accuracy. These include the Acquisition Cost, Acquisition Date, Additional Capital Cost, Activation Date, Total Cost, and Depreciation Period. The responsible person to verify this data could be the equipment manager, property book officer, or resource management officer. You must retain a written statement, by the responsible individual, verifying the correctness of the data for all capital equipment received after 1 Oct 99. Retain this statement in the fixed asset value supporting document files for the life of the equipment.

c. POC: M. Morris/AMXEN-L/DSN 793-8301.

10. SUBJECT: Funding for Materials Handling Equipment (MHE).

a. ISSUE: In 1996, Congress raised the ceiling for the use of OPA funds from $25,000 to $100,000. As a result, the Office of the Deputy Chief of Staff for Operations and Plans (ODCSOPS) will no longer centrally fund MHE with a unit cost less than $100,000. Not all installations are changing the Chapter 2 Line Item Number (LIN) for MHE, to a LIN in Chapter 6.

b. DISCUSSION: The ODCSOPS provided a listing of the MHE LINs they will no longer centrally fund. You must find a suitable Chapter 6 LIN in the SB 700-20 for any of these LINs currently on your TDA. If you have a Chapter 2 asset on hand, we suggest you carry it as a substitute under the new Chapter 6 LIN. Make the changes to your TDA during the next management of change open window processing period.

(a) Listed below are the LINs no longer funded:

C51311	T49119	X49188	X51299	X52202

F06835	T49266	X50284	X51380	X52339
F07109	T51036	X50436	X51517	X52476
F35816	T73474	X50489	X51585	X52613
F38967	T73645	X50832	X51654	X52750
F39104	W89557	X50900	X51671	X52784
S12271	X45283	X50969	X51691	X52813
T48972	X48914	X51106	X51928	X54668
T49096	X49051	X51243	X52065	X56997
				X89283

(b) The following LINs are obsolete, no replacement:

L76282	T67663	W89146	W89420	X51037
S12271	W89009	W89283	X50695	X52407
				X52810

(c) LIN C38924 has no requirements.

c. POC: D. Fuglsang/AMXEN-L/DSN 793-8361.

11. SUBJECT: Accountability and Control of Small Arms Weapons and Ammunition.

a. ISSUE: The loss or theft of small arms weapons and ammunition may have disastrous results.

b. DISCUSSION:

(1) Because of the potential danger, this subject attracts much congressional, media, and public interest. Thus, it is a frequent area of concern for auditors and inspectors. We know you stepped up your efforts in response to the Apr 98 report of the AMC Inspector General Special Assessment of Accountability of Materiel; however, in Apr 99, the Department of the Army Inspector General (DAIG) reported finding similar and new deficiencies during a special assessment of the Army's accountability and security of small arms weapons and munitions. The DAIG identified problems with security and accountability at the wholesale and retail levels.

(2) We want to stress user and installation level accountability and control. For security questions, we defer to the expertise of the AMC Provost Marshall and his command security advisors. We recommend you perform the following:

(a) Use the PB to account for small arms weapons in use or in your arms room. Account for those pending issue or transfer on the stock record account. In both cases, include prototypes, models, experimental items, and those you're holding for contingency purposes. Control and report historical items IAW AR 870-20, 11 Jan 99, Army Museums, Historical Artifacts, and Art.

(b) Account for operational load ammunition as prescribed in AR 710-2, 31 Oct 97, Inventory Management Supply Policy Below the Wholesale Level, paragraph 2-39c. Record on the PB the quantity of ammunition you need for peacetime operations, but don't expect to consume. Use hand receipt procedures, similar to those for training ammunition, found in DA Pamphlet 710-2-1, 28 Feb 94, Using Unit Supply System (Manual Procedures) in paragraphs 11-8 through 11-17, for the quantity you expect to consume within 5 days of issue. This includes qualification or familiarization firing, ceremonial salutes, disposal of duds, etc. Do not allow units to draw more ammunition than they need. To the extent possible, turn-in unexpended rounds and residue within 5 days after the qualification/familiarization ceremony or other event.

(c) Make sure your staff, museum staff, and users conduct inventories of weapons and munitions as prescribed, whether the items are in storage, on display, or issued for use/training.

(d) Report to the Unique Item Tracking (UIT) data base any transfers (in or out) of small arms. Reconcile the UIT data base records with your property accounting records.

c. POC: R. Strosahl/AMXEN-L/DSN 793-5827.

12. SUBJECT: Excess Ammunition and Explosives Identified on Mission Stock Record Accounts (MSRAs).

a. ISSUE: There are no procedures in place to determine stockage levels based on demand.

b. DISCUSSION:

(1) Paragraph 3-38e in AR 710-2, 31 Oct 97, states; "Class 5 stocks will be monitored for excess stockage and possible redistribution of that excess stockage.

Class 5 items that are excess to the needs or authorization of the owning activity (unit) will be reported as excess for turn-in."

(2) We approved several requests to establish MSRAs as a formal accountability record for Ammunition and Explosive (A&E) stocks. These approved accountability records, requested mainly by Research and Development (R&D) activities, were a result of our determining that MSRAs would best serve their needs, in lieu of A&E property book accountability. Several factors in R&D missions sometimes do not make it practical to expend all A&E stocks within the allowable timeframes from date of issue. The Army regulations require you turn-in or post to the PB all A&E issues not consumed within these allowable timeframes.

(3) As part of our assessment and assistance visits, we include reviewing procedures used in managing A&E MSRAs. We find that most A&E MSRAs do not have procedures in place to determine excess A&E stocks based on demands. Consequently, the owning activities are expending their limited resources on storage, inventories, and record maintenance for items showing no current or recent needs. We discovered several sites having standard A&E stocks onhand, but no demands for several years. This is not a sound way of doing business. Coordinating demand reviews with all your MSRA customers, based on their current or projected A&E stockage needs, will enable you to determine what you should turn-in.

c. POC: D. Emerick/AMXEN-L/DSN 793-8316.

13. SUBJECT: Command Supply Discipline Program (CSDP).

a. ISSUE: Installations are not using internal management controls to evaluate property accountability.

b. DISCUSSION:

(1) The purpose of the CSDP is to keep the Commander informed regarding the accomplishment of regulatory responsibilities. Appendix B of AR 710-2, 31 Oct 97, describes the CSDP. Paragraph B-1c encourages commanding officers to use existing resources; i.e., Command Inspection Program, internal review office, staff personnel, etc., rather than establishing new evaluation teams. Paragraph 1-13f(3) requires commanding officers at all levels to implement the CSDP and appoint a monitor (senior logistician) to oversee the programs. Tables B-1 through B-2 address the responsibilities for user level and PB management, and Table B-7 contains the CSDP evaluation frequency.

(2) During our reviews we find installations with ineffective CSDPs. Our subsequent findings indicated that if the commands had a strong CSDP, we would not have as many observations. The CSDP is the most comprehensive self-help program available to Commanders and each level of management. It addresses supply discipline through easily identified requirements, compliance, regulatory reference, and frequency of application. The frequency of application, as described in Table B-7, is the minimal frequency. We encourage you to apply evaluations to your functional areas of supply support as often as you feel necessary. The CSDP evaluations provide an important source of feed back to Commanders regarding their units strengths and weaknesses. This feedback identifies where the command needs to focus their resources more efficiently to enhance the quality/excellence of their supply support operations.

c. POC: D. Emerick/AMXEN-L/DSN 793-8316.